

EXHIBIT A

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April 25, 2007

Via Facsimile and Regular Mail

John M. LaRosa, Esq.
Law Offices of John M. LaRosa
Two East Seventh Street, Suite 302
Wilmington, DE 19801

Re: Linda J. Blozis v. Mellon Trust of Delaware, National Association, et al

Dear John:

Please provide us with a supplemental economist expert report that, among other things, adjusts Dr. Borzilleri's calculation of Ms. Blozis' alleged damages. Please provide the revised report by May 4, 2007.

Very truly yours,



Stephanie Wilson

SW:mf
Enclosure

cc: John Unkovic, Esq.
Paul Rooney, Esq.

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EXHIBIT B



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April 26, 2007

Via Facsimile and Regular Mail

John M. LaRosa, Esq.
Law Offices of John M. LaRosa
Two East Seventh Street, Suite 302
Wilmington, DE 19801

Re: Linda J. Blozis v. Mellon Trust of Delaware, National Association, et al

Dear John:

During Dr. Bozilleri's April 5, 2007 deposition, I requested the following documents:

- Any and all prior expert reports that Dr. Bozilleri provided to or on behalf of your firm or Mr. Neuberger's firm.
- Any and all copies of deposition transcripts or trial transcripts of Dr. Bozilleri's testimony in connection with his retention as an expert on behalf of your firm or for Mr. Neuberger's firm.
- A copy of the retention letter between your firm and Dr. Bozilleri.
- A copy of any speeches or handouts or documents that Dr. Bozilleri presented to the Maryland Trial Lawyers Association.
- A copy of your letter dated January 3, 2007 to Dr. Bozilleri as testified to by Dr. Bozilleri on page 27 of his April 5, 2007 transcript.

Additionally, please provide, all updated compensation information for Ms. Blozis to date including 2007, but not limited to, earnings to date, 401K contributions, bonuses and salary increases.

Very truly yours,

A handwritten signature in black ink, appearing to be "SW", written over a horizontal line.

Stephanie Wilson

SW:mf
Enclosure

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EXHIBIT C

Rooney, Paul P.

From: Wilson, Stephanie
Sent: Wednesday, May 16, 2007 12:40 PM
To: 'John M. LaRosa, Esquire'
Cc: Neuberger, Esq. Thomas S.; Neuberger, Esq., Stephen; Rooney, Paul P.
Subject: RE: Blozis v. Mellon: Pre-trial Exchanges

Hello John, I note that you haven't provided Plaintiff's version of the pretrial yet and the jury materials are due tomorrow. I also note that Defendants requested that Plaintiff supplement her expert's report and produce other documents related to expert discovery and her damages and we have not received them. Very truly yours,
Stephanie

Stephanie Wilson
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From: John M. LaRosa, Esquire [mailto:JLR@LaRosaLaw.com]
Sent: Wednesday, April 11, 2007 10:57 AM
To: Wilson, Stephanie
Cc: Neuberger, Esq. Thomas S.; Neuberger, Esq., Stephen
Subject: Blozis v. Mellon: Pre-trial Exchanges

Stephanie:

The following will confirm our telephone conversation this morning. In preparation for the Pretrial Conference in the above captioned matter scheduled for June 5, 2007, and the Joint Pre-trial Order and Jury Materials (Jury Instructions, Special Verdict, and Voir Dire) to be submitted by May 31st,

Plaintiff will submit to Defendants drafts of the

P1) Pretrial Order including witnesses and exhibits on May 11th and

P2) Jury Materials (Jury Instructions, Special Verdict, and Voir Dire) on May 17th;

Defendants will submit to Plaintiff drafts of the

05/22/2007

D1) Pretrial Order including witnesses and exhibits on May 21st and

D2) Jury Materials (Jury Instructions, Special Verdict, and Voir Dire) on May 24th; and

The parties will confer by telephone regarding the

J1) Joint Pretrial Order on May 25th @ 4 p.m. and

J2) Joint Jury Materials (Jury Instructions, Special Verdict, and Voir Dire) on May 29th @ 5 p.m.

Very truly yours,

John M. LaRosa

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05/22/2007

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

LINDA J. BLOZIS, x
:
Plaintiff, :
vs. : Civil Action
: Number: 05-991-SLR
MELLON TRUST OF DELAWARE, :
NATIONAL ASSOCIATION, a :
Pennsylvania corporation; :
MELLON BANK, NATIONAL :
ASSOCIATION (formerly Mellon: Bank (DE) National :
Association), a Pennsylvania: corporation; and MELLON :
FINANCIAL CORPORATION, a :
Pennsylvania corporation, :
:
Defendants. x

Thursday, April 5, 2007

Washington, D.C.

DEPOSITION OF:

THOMAS C. BORZILLERI, PH.D.,

a witness, was called for examination by counsel for
the defendants, pursuant to Notice and agreement of
the parties as to time and date, beginning at
approximately 10:08 o'clock, a.m., taken at the law
offices of Reed Smith, Esquires, 1301 K Street, N.W.,
East Tower, 11th Floor, Washington, D.C., before

1 concerning Ms. Blozis' loses.

2 Q Okay. And the final page on that has a
3 January 30th, 2007, date that was an addendum?

4 A Yes, ma'am.

5 Q So, the January 29th report and the
6 January 30th '07 addendum, does that constitute your
7 complete statement of your opinions concerning Ms.
8 Blozis' loses?

9 A Yes, it does.

10 Q Now in terms of writing your report, you
11 have listed various information in it that you relied
12 upon. For example, on page eight there looks to be a
13 reference list?

14 A Yes.

15 Q And on the following pages where there
16 are charts, there are other things that are
17 referenced on the charts and how you came up with
18 your calculations?

19 For example, there is PBGC is referenced.
20 Things of that nature. In addition to what's
21 identified in the report, you had stated on page one
22 that you also reviewed information that was provided

1 to you by counsel?

2 A Yes, ma'am.

3 Q What information was that?

4 A I received a letter from Mr. LaRosa dated
5 January 3rd of 2007 that contained a lot of basic
6 information that I relied on to do the calculations.

7 I received a copy of her resume. I
8 received a letter from Mellon Bank. Actually it's
9 the other side that I paid more attention to which
10 was her W-2s for 2001. A copy of the Mellon Bank
11 retirement plan. A pay stub from Mellon Bank for
12 July of 2003, and her tax returns. 2001 through
13 2005.

14 A letter dated September 15th, 2005, to
15 the EEOC I guess where they were outlining what they
16 thought their damages were. A W-2 for 2002. A W-2
17 for 2005 and 2004.

18 A copy of the record that was done by
19 your experts, the Center for Forensic Economics
20 Studies, and then an e-mail I got from Mr. LaRosa
21 instructing me what to do with respect to the 401K
22 plan benefits that she had.

1 Three percent with Mellon, and she has
2 neither with the current employer and she has no
3 pension with the current employer to factor in
4 mitigation. And that's it.

5 Q Any deposition transcripts?

6 A No, ma'am.

7 Q Doctor, I want to turn your attention to
8 page one of your report. And I want to ask you some
9 questions on worklife expectancy.

10 A Yes.

11 Q With respect to the work left expectancy
12 component of your report, what sources did you review
13 in connection with that?

14 A Well, the key source is footnoted at the
15 bottom of the report. These are two studies that
16 have been done by Millimet. One Estimating Worklife
17 Expectancy; an Econometric Approach.

18 And the other is Marriage, Children, and
19 Worklife Expectancy also by Millimet and other
20 authors. Those are the two items that I rely on for
21 worklife expectancy in all my cases now.

22 Q Why is that when you say those were the

1 present value part of the calculation.

2 Q Okay. And is that your number 65.5 after
3 everything is said and done so to speak?

4 A That is correct. It adds four-tenths of
5 a year to it by taking out the survival probability
6 adjustment.

7 Q Okay. Doctor, turning your attention to
8 page one of your report, the last paragraph on page
9 one. Primarily I'm concerned with the third sentence
10 where you're talking about her present employment
11 with Orion Bank. Do you see where I am?

12 A Yes.

13 Q She has been employed by Orion Bank since
14 January 24, 2005, and she now is earnings \$24,000 per
15 year. Do you see that?

16 A Yes, ma'am.

17 Q Did you receive any information that Ms.
18 Blozis' salary has increased?

19 A Yes, indirectly.

20 Q When you say indirectly?

21 A I looked at the report that had been
22 prepared by your -- the defense economist and there

1 is a line in that that says she's currently making
2 \$32,000 a year. That was certainly unknown to me at
3 the time I did the calculation. If that's true, the
4 numbers should be adjusted for that change.

5 Q Have you made any adjustments to your
6 report?

7 A No.

8 Q And are you going to?

9 A Prior to trial for sure. I don't know
10 when we go to trial, but I would certainly want to
11 use current information if she's making 33, or 35, or
12 40, whatever it might be.

13 Q Yes, whatever it my be. I guess June is
14 the trial date.

15 A Okay.

16 Q In connection with Blozis' employment
17 with Orion, were you aware that she had I guess prior
18 to getting bumped up to 32K had gotten some increases
19 in salary before then?

20 A Well, again only by looking at the
21 defense report. They stated in their report -- Yes.
22 They state here on page two on January 30, 2005, she

1 started at Orion. Earned 24,070. She accepted a
2 promotion on January 8 of 2006 and is now earning
3 \$32,000 per year. That's all I know about it.

4 Q Okay. So in terms of other increases
5 before receiving the 32K, you don't have any
6 information as to that?

7 A I do not.

8 Q What about bonus payments?

9 A Know nothing about that either.

10 Q With respect to 401K at Orion, does Orion
11 have a 401K plan?

12 A I believe they have a 401K plan, but that
13 she could not afford to participate in it. I was
14 instructed by the plaintiff's attorney to ignore the
15 potential because her income was too low.

16 Q When you say that it was too low, meaning
17 she felt -- Ms. Blozis felt that her income was too
18 low to put aside something in the 401K?

19 A I don't know the level of match, if there
20 is a match. The basic story is at 24 thousand a year
21 she didn't have sufficient income to be putting it
22 into a 401K. That's what I was told by plaintiff's